

United States District Court  
Southern District of Texas  
FILED

JUN 13 2015

## UNITED STATES DISTRICT COURT

David J. Bradley, Clerk

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

Joaquina FERRAL-Jonguitud  
(YOB: 1975) MX

## CRIMINAL COMPLAINT

Case Number: 11-15-0960-M

I, Antonio Perez IV., the undersigned complainant state that the following is true and correct to the best of my

Knowledge and belief. On or about June 12, 2015 in Hidalgo County, in  
(Date)  
the Southern District of Texas Defendant(s) did,

- i. knowingly conspire to possess with intent to distribute a controlled substance. The controlled substance involved was approximately 11.32 kilograms of methamphetamine, a Schedule II controlled substances; and
- ii. knowingly and intentionally possess with the intent to distribute approximately 11.32 kilograms of methamphetamine, a Scheduled II controlled substance.

in violation of Title 21 United States Code, Section(s) 841 and 846.I further state that I am a(n) HSI Special Agent And that this complaint is based on the  
Official Title  
following facts:

See Attachment "A"

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ NoAP  
Signature of ComplainantAntonio Perez IV, HSI  
Printed Name of Complainant

Sworn to before me and signed in my presence,

June 13, 2015  
Date4:09 pm atMcAllen, Texas  
City and StateU.S. Magistrate Judge Peter Ormsby  
Name and Title of Judicial OfficerPeter Ormsby  
Signature of Judicial Officer

### **Attachment "A"**

On June 12, 2015, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in McAllen, Texas received a duty call from the U.S. Customs and Border Protection, Office of Fields Operations (CBP/OFO) at the Hidalgo, Texas Port of Entry. Joaquina FERRAL-Jonguitud attempted to enter the United States from the United Mexican States with 11.32 kilograms of methamphetamines concealed in a non-factory compartment in the rocker panels of a 2007 red Jeep Compass.

On June 12, 2015, a 2007 red Jeep Compass displaying Mexican license plates 934TPN6 arrived at an inspection lane at the Hidalgo Port of Entry which was manned by CBP Officer (CBPO) J. Gaytan. CBPO Gaytan obtained a negative declaration from the FERRAL. CBPO J. Gaytan referred FERRAL to secondary for further inspection.

At secondary CBPO J. Gaytan obtained a second negative declaration from FERRAL. CBPO D. Garcia conducted a non-intrusive inspection of the vehicle utilizing the VACIS (X-ray) system. CBPO D. Garcia observed anomalies in the rocker panels of the vehicle. A further inspection resulted in the discovery of packages in the rocker panels. A field test revealed that the substance inside the packages and was a positive match for methamphetamines. HSI Special Agent (SA) A. Perez advised CBPO officers to remove the contraband from the vehicle seats which resulted in 22 packages of methamphetamines weighing 11.32 kilograms as per the CBP scale.

HSI McAllen conducted an interview with FERRAL. Special Agent (SA) A. Perez read FERRAL her Miranda rights as witnessed by SA E. Diaz. FERRAL stated she understood her rights and voluntarily waived them in writing. FERRAL made the following non-verbatim statements that have been paraphrased and may not be in the order in which she gave them:

FERRAL stated she was aware the vehicle contained narcotics. FERREL claimed she did not know the type of narcotic's she was transporting. FERRAL was expecting a payment of \$2,000.00 dollars for transporting the narcotic's from Reynosa, Tamaulipas, Mexico to McAllen, Texas.